

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Brock Fredin,

Plaintiff,

Court File No. 17-cv-03058 (SRN/HB)

v.

Lindsey Middlecamp,

Defendant.

SECOND DECLARATION OF K. JON BREYER

I, K. Jon Breyer, declare as follows:

1. I am an attorney with the law firm of Kutak Rock LLP and counsel to Defendants in the above-captioned matters. I submit this affidavit in support of Defendants' Motion for Summary Judgment.

2. Fredin has attempted to create a false narrative around me that includes allegations that I have changed my name to "escape allegations that he is related to Auschwitz [sic] guard Johann Breyer," and that I have "participated in the attempted violence, torture, and assault by engaging in extrajudicial communication with Saint Paul Police Officers David McCabe, Sarah Nasset, and Tara Patet." I have no known lineage that traces back to any Auschwitz guard bearing a similar name and I have never communicated with Saint Paul Police Officer David McCabe, Sarah Nasset, or Tara Patet. I use the abbreviated "Jon", a variation of "Johann", because that is what I have been called

since childhood. The use of K. Jon Breyer simply makes it easier for clients, attorneys, and the Court to identify me without the confusion of using a name that is seldom used. I am extremely proud of my birth name and Fredin honors me when he uses it.

3. Attached hereto as **Exhibit 1** is a Facebook post from Plaintiff Brock Fredin evidencing his knowledge of which victim had accused him of rape.

4. Attached hereto as **Exhibit 2** are select pages from the Deposition of Brock Fredin where him claims ignorance regarding his post.

I declare under the penalty of perjury that the foregoing is true and correct. Executed this 3rd day of September, 2020 at Minneapolis, Minnesota.

/s/K. Jon Breyer
K. Jon Breyer